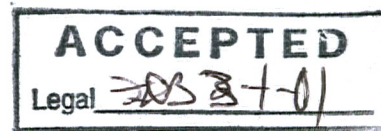


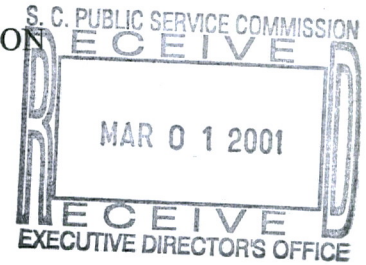
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STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2001- 76 -C



IN THE MATTER OF:)

Petition to Establish a Proceeding to)
Review the Management of Telephone)
Numbering Resources and Telephone)
Number Conservation in South Carolina)



Philip S. Porter, Consumer Advocate for the State of South Carolina, respectfully petitions the South Carolina Public Service Commission (Commission), pursuant to R. 103-836 and other applicable provisions of the Commission's Rules of Practice and Procedure, for an order creating a new docket to review the management of telephone numbering resources and telephone number conservation in South Carolina, and for a public hearing. In support of this Petition, the Consumer Advocate would show as follows:

1. Philip S. Porter is the duly appointed and qualified Consumer Advocate for the State of South Carolina. Pursuant to S.C. Code Ann. § 37-6-606 (1989), the Consumer Advocate has the discretionary duty to petition regulatory agencies to commence a proceeding when he determines that such a proceeding would be in the public interest.

2. On February 20, 2001, a presentation was made to the Commission in its Informal Agenda Session by Thomas C. Foley of Neustar, Inc. (Neustar) concerning area code relief for the 803 and 843 area codes in South Carolina. Neustar is the Administrator of the North American Numbering Plan. In that presentation, Mr. Foley discussed meetings among

industry officials concerning area code relief, and presented the Commission the industry's conclusions regarding future relief in South Carolina. According to that presentation, the industry proposal would be for the addition of two area codes for South Carolina, one in the 803 area code in the Midlands, and another in the 843 area code along the coast. The new area codes would not result in further geographic splits of these areas, as has been done in the past, but would be "overlay" area codes for all telephone services. Under this plan, neighbors could have different area codes. This arrangement would also require telephone users in these areas to dial ten digits for every local call once the new codes were implemented.

In the presentation, Mr. Foley stated the familiar reason for the exhaustion of numbers, namely new lines for cell phones, fax machines, pagers, and other telecommunications equipment. However, he also acknowledged that this was not the entire problem, pointing to the fact that numbers are being exhausted due to reservation of numbers in blocks of 10,000 by existing and new competitive telecommunications companies. Companies reserve these numbers, and hold onto them, regardless of whether they have anywhere close to that number of customers. Mr. Foley also acknowledged that the industry meetings did not discuss or propose any methods of number management or conservation to prolong the need for new area codes. Both the Federal Communications Commission and other state commissions have studied, and continue to examine methods to make more efficient use of the limited numbering resources. These methods include, but are not limited to: rate center consolidation, number pooling and reclamation, full local number portability, and service specific overlays.

Since telephone numbers are assigned based on rate centers, consolidation would result in fewer blocks of numbers being needed by new competitors. Number pooling and reclamation

involves companies returning unused numbers to a pool or assigning numbers in blocks of less than 10,000. Number portability allows a customer to take his existing telephone number with him if he switches service to another company, as long as he is still in the same geographic rate center area. Most telephone subscribers in South Carolina already pay a fee on their monthly bill to allow number portability. Finally, service specific overlays would assign specific area codes to specific services, such as a specific area code for cell phones or pagers. These methods have been shown to delay the need for new area codes, and should be examined by the Commission in an open formal proceeding, where input from all interested parties, and the general public can be heard.

3. By a filing with the Commission dated February 22, 2001, Neustar has made an “informal request” for approval of the relief plan for the 803 and 843 area codes, which was discussed in the Commission’s February 20 meeting. The schedule suggested in the filing would require mandatory ten digit dialing of all local calls in the 803 and 843 area codes by October 2002.

4. The Consumer Advocate believes that the Commission should not approve this request without conducting the full open proceeding requested above. South Carolinians have faced two area code splits since 1996. Mandatory dialing for the 864 upstate area code began in May 1996, and mandatory dialing for the coastal 843 area code began in September 1998. If, and when, more local competition comes to South Carolina, more telecommunications providers requesting more blocks of 10,000 numbers will only accelerate number exhaustion unless measures are put in place now to slow down that process. It is clear that existing procedures have not done so.

5. Although the industry may have reached a consensus on the method to use to deal with number exhaustion, there has been no input from either residential or business telephone customers. Public input is vital, because it is the public which must ultimately deal with these proposed changes. Solutions must be found that result in the least customer confusion and costs to those consumers.

WHEREFORE, the Petitioner, in order to represent the consumer interest of the State of South Carolina, requests:

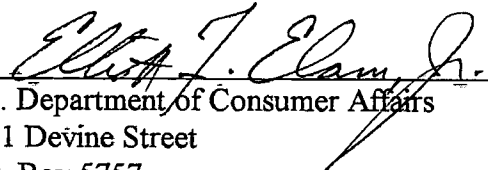
- (1) that the Commission grant this Petition, and issue an order creating a new docket as soon as possible to examine the issues set forth above, and to schedule a public hearing;
- (2) that the Consumer Advocate be made a formal party of record in this matter; and
- (3) a copy of all filings, pleadings, testimony and exhibits filed by all parties of record concerning this proceeding.

Philip S. Porter
Consumer Advocate

Nancy Vaughn Coombs
Deputy Consumer Advocate

Elliott F. Elam, Jr.
Staff Attorney

By: _____


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February 28, 2001

CERTIFICATE OF SERVICE

This is to certify that I, Elliott F. Elam, Jr., on behalf of Philip S. Porter, Consumer Advocate, have served this day the foregoing **Petition** upon the persons named below, at the addresses set forth, by deposit in the United States mail, postage prepaid.

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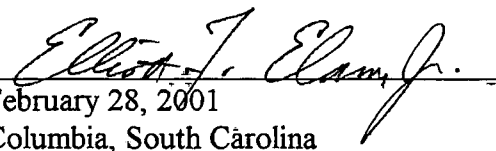
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February 28, 2001
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